

REMARKS

The final Office Action mailed March 20, 2007 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1, 3-7, 10-16, 18-22 and 25-30 are now pending in this application. Claims 1, 3-7, 10-16, 18-22 and 25-30 stand rejected. Claims 2, 8, 9, 17, 23 and 24 have been canceled.

The rejection of Claims 1, 5-7, 10-13, 16, 20-22 and 25-28 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,234,161 to Levi (hereinafter referred to as "Levi") in view of U.S. Patent No. 6,050,893 to Waite (hereinafter referred to as "Waite") is respectfully traversed.

Levi describes a gas cooking appliance (2) including a cooktop (5) that includes an upper peripheral portion (13) and a recessed well area (15). A chamber (123) is defined by the cooktop (5) and an isolation pan (102) is coupled to an underside of the cooktop (5). The peripheral portion (13) includes a plurality of air openings (120 and 121) defined therein. The peripheral portion (13) and the plurality of openings (120 and 121) are raised above gas burners (20), (21), (22) and (23), and facilitate drawing air into the chamber (123). A central set of openings (124) are also defined on peripheral portion (13) and exhaust air from an oven cavity (38). As shown in Figure 1, the openings (120, 121 and 124) are flush with the peripheral portion (13) of the cooktop (5). Notably, Levi does not describe or suggest a vent trim that includes a surface with openings that is raised above a top surface and at least one vent cut of a cooktop to facilitate isolating the openings from spills on the cooktop.

Waite describes a vent cover for an attic fan mounted above a ceiling to prevent air from leaking through the vent. The cover includes an outer border (2) including retaining members (8) used to couple panels (5), (6) and (7) to a bottom surface of the outer border (2) and lips (4) of a frame (1). Notably, Waite does not describe or suggest a vent trim that includes a surface with openings that is raised above a top surface and at least one vent cut of a cooktop to facilitate isolating the openings from spills on the cooktop.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. Neither Levi nor Waite, considered alone or in combination, describes or suggests the claimed combination. Further, in contrast to the Examiner's assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Levi and Waite because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching. Rather, only the conclusory assertion that it would have been obvious at the time the invention was made to one of ordinary skill in the art "to modify the Levi apparatus by replacing the Levi seals with the Waite clips in order to allow the vent to be quickly installed onto the cooktop surface" suggests combining the disclosures.

As explained by the Federal Circuit, "to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the Applicant." In re Kotzab, 54 U.S.P.Q.2d 1308, 1316 (Fed. Cir. 2000); M.P.E.P. 2143.01.

Further, as is well established, the mere fact that the prior art structure could be modified does not make such a modification obvious unless the prior art suggests the desirability of doing so. See In re Gordon, 221 U.S.P.Q.2d 1125 (Fed. Cir. 1984). The Federal Circuit has determined that:

[i]t is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. This court has previously stated that "[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention."

In re Fritch, 23 U.S.P.Q.2d 1780, 1784 (Fed. Cir. 1992).

Further, under Section 103, “it is impermissible . . . to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.” In re Wesslau, 147 U.S.P.Q. 391, 393 (CCPA 1965). Rather some suggestion to combine such references and a reasonable expectation of success must both be found in the prior art, and not based on Applicants’ disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, or any reasonable expectation of success has been shown.

Accordingly, since there is no teaching or suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for at least this reason, Applicants request that the Section 103 rejection be withdrawn.

If art “teaches away” from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited art, as a whole, is not suggestive of the presently claimed invention. Moreover, Applicants respectfully submit Waite teaches away from a vent trim and/or a cover member that includes a surface with openings that is raised above a top surface and at least one vent cut of a cooktop to facilitate isolating the openings from spills on the cooktop, as set forth in Claims 1, 10, 16 and 25. Specifically, as discussed above, Waite is directed to a vent cover for an attic fan mounted above a ceiling to prevent air from leaking through the vent.

Accordingly, Applicants respectfully submit that the cited art as a whole teaches away from the assembly as recited in Claims 1, 10, 16 and 25.

Moreover, and to the extent understood, neither Levi nor Waite, considered alone or in combination, describes or suggests the claimed invention. Claim 1 recites an air inlet system for a gas cooking apparatus comprising at least one gas burner and a burner box

around the at least one gas burner, said air inlet system comprising “a cooktop configured to cover the burner box and having at least one peripheral vent cut configured to vent outside air into the burner box to provide air for the at least one gas burner, said at least one peripheral vent cut defining a recessed corner of said cooktop; and a vent trim attached to said cooktop and covering said at least one peripheral vent cut, said vent trim comprising a surface with openings raised above a top surface and said at least one peripheral vent cut of said cooktop, said vent trim facilitating isolating said openings from spills on said cooktop, an attachment portion overlapping said top surface of said cooktop, and at least one clip overlapping a bottom surface of said cooktop, said vent trim surface defining an underlying cavity, wherein said openings are configured to allow outside air to enter the burner box through said vent trim.”

Neither Levi nor Waite, considered alone or in combination, describes or suggests an air inlet system for a gas cooking apparatus, as recited in Claim 1. More specifically, neither Levi nor Waite, considered alone or in combination, describes or suggests a vent trim that includes a surface with openings that is raised above a top surface and at least one vent cut of a cooktop to facilitate isolating the openings from spills on the cooktop, as required by Applicants’ claimed invention. Rather, in contrast to the present invention, Levi describes a cooktop including an integral peripheral portion defining a plurality of openings in the cooktop, and Waite merely describes an attic vent cover including retaining clips for coupling portions of the cover to the attic vent.

Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Levi in view of Waite.

Claims 5-7 depend from independent Claim 1. When the recitations of Claims 5-7 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 5-7 likewise are patentable over Levi in view of Waite.

Claim 10 recites an air inlet system for a gas cooking apparatus having at least one gas burner and a burner box around the at least one gas burner, said air inlet system comprising “a cooktop configured to cover the burner box and having at least one peripheral

vent cut configured to vent outside air into the burner box to provide air for the at least one gas burner; and an elongated cover member attached to a top face of said cooktop and covering said at least one peripheral vent cut, said cover member having a surface with openings configured to allow outside air to enter said at least one peripheral vent cut through said cover member, said cover member including a surface raised above said cooktop and said at least one peripheral vent cut, said cover member facilitating isolating said openings from spills on said cooktop, said surface defining an underlying cavity, said cover member comprising at least one tab extending within said cavity to mount said cover member on said top face, and said tab engaging a top surface of said top face.”

Neither Levi nor Waite, considered alone or in combination, describes or suggests an air inlet system for a gas cooking apparatus, as recited in Claim 10. More specifically, neither Levi nor Waite, considered alone or in combination, describes or suggests a cover member that has a surface with openings, wherein the surface is raised above a cooktop and at least one peripheral vent cut to facilitate isolating the openings from spills on the cooktop, as required by Applicants’ claimed invention. Rather, in contrast to the present invention, Levi describes a cooktop including an integral peripheral portion defining a plurality of openings in the cooktop, and Waite merely describes an attic vent cover including retaining clips for coupling portions of the cover to the attic vent.

Accordingly, for at least the reasons set forth above, Claim 10 is submitted to be patentable over Levi in view of Waite.

Claims 11-13 depend from independent Claim 10. When the recitations of Claims 11-13 are considered in combination with the recitations of Claim 10, Applicants submit that dependent Claims 11-13 likewise are patentable over Levi in view of Waite.

Claim 16 recites a gas cooking apparatus comprising “at least one gas burner; a burner box for said at least one gas burner; a cooktop configured to cover said burner box and having at least one peripheral vent cut configured to vent outside air into said burner box to provide air for said at least one gas burner, said at least one peripheral vent cut defining a recessed corner of said cooktop; and a vent trim attached to said cooktop and covering said at

least one peripheral vent cut, said vent trim comprising a surface with openings raised above a top surface and said at least one peripheral vent cut of said cooktop, said vent trim facilitating isolating said openings from spills on said cooktop, an attachment portion overlapping said top surface of said cooktop, and at least one clip overlapping a bottom surface of said cooktop, said vent trim surface defining an underlying cavity, wherein said openings are configured to allow outside air to enter said burner box through said vent trim.”

Neither Levi nor Waite, considered alone or in combination, describes or suggests a gas cooking apparatus, as recited in Claim 16. More specifically, neither Levi nor Waite, considered alone or in combination, describes or suggests a vent trim that includes a surface with openings raised above a top surface and at least one vent cut of a cooktop to facilitate isolating the openings from spills on the cooktop, as required by Applicants’ claimed invention. Rather, in contrast to the present invention, Levi describes a cooktop including an integral peripheral portion defining a plurality of openings in the cooktop, and Waite merely describes an attic vent cover including retaining clips for coupling portions of the cover to the attic vent.

Accordingly, for at least the reasons set forth above, Claim 16 is submitted to be patentable over Levi in view of Waite.

Claims 20-22 depend from independent Claim 16. When the recitations of Claims 20-22 are considered in combination with the recitations of Claim 16, Applicants submit that dependent Claims 20-22 likewise are patentable over Levi in view of Waite.

Claim 25 recites a gas cooking apparatus comprising “at least one gas burner; a burner box for said at least one gas burner; a sealed cooktop configured to cover said burner box and having at least one peripheral vent cut configured to vent outside air into said burner box to provide air for said gas burner; and an elongated cover member attached to a top face of said cooktop and covering said at least one peripheral vent cut, said cover member having a surface with openings configured to allow outside air to enter said at least one peripheral vent cut through said cover member, said cover member including a surface raised above said cooktop and said at least one peripheral vent cut, said cover member facilitating isolating said

openings from spills on said cooktop, said surface defining an underlying cavity, said cover member comprising at least one tab extending within said cavity to mount said cover member on said top face, and said tab engaging a top surface of said top face.”

Neither Levi nor Waite, considered alone or in combination, describes or suggests a gas cooking apparatus, as recited in Claim 25. More specifically, neither Levi nor Waite, considered alone or in combination, describes or suggests a cover member that has a surface with openings, wherein the surface is raised above a cooktop and at least one peripheral vent cut and the cover member to facilitate isolating the openings from spills on the cooktop, as required by Applicants’ claimed invention. Rather, in contrast to the present invention, Levi describes a cooktop including an integral peripheral portion defining a plurality of openings in the cooktop, and Waite merely describes an attic vent cover including retaining clips for coupling portions of the cover to the attic vent.

Accordingly, for at least the reasons set forth above, Claim 25 is submitted to be patentable over Levi in view of Waite.

Claims 26-28 depend from independent Claim 25. When the recitations of Claims 26-28 are considered in combination with the recitations of Claim 25, Applicants submit that dependent Claims 26-28 likewise are patentable over Levi in view of Waite.

For at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 1, 5-7, 10-13, 16, 20-22 and 25-28 be withdrawn.

The rejection of Claims 3, 4, 14, 15, 18, 19, 29 and 30 under 35 U.S.C. § 103(a) as being unpatentable over Levi in view of Waite, and further in view of U.S. Patent No. 5,653,219 to Taplan et al. (hereinafter referred to as “Taplan”) is respectfully traversed.

Levi and Waite are described above.

Taplan describes a cooktop (1) including a cook plate (2) and an air-inlet device (9) attached to a bottom surface of the cook plate (2) to cover an opening/gap (8) defined in the cook plate (2). Notably, Taplan does not describe or suggest a vent trim that includes a

surface with openings that is raised above a top surface and at least one vent cut of a cooktop to facilitate isolating the openings from spills on the cooktop.

Applicants respectfully submit that the Section 103 rejection of the presently pending claims is not a proper rejection. As is well established, obviousness cannot be established by combining the teachings of the cited art to produce the claimed invention, absent some teaching, suggestion, or incentive supporting the combination. None of Levi, Waite and Taplan, considered alone or in combination, describes or suggests the claimed combination. Further, in contrast to the Examiner's assertion within the Office Action, Applicants respectfully submit that it would not be obvious to one skilled in the art to combine Levi, Waite and Taplan because there is no motivation to combine the references suggested in the art. Additionally, the Examiner has not pointed to any prior art that teaches or suggests to combine the disclosures, other than Applicants' own teaching. Rather, only the conclusory assertion that it would have been obvious at the time the invention was made to one of ordinary skill in the art "to modify the Levi [apparatus] in view of the Waite apparatus with the adhesive seal of Taplan in order to provide a water-tight yet elastic seal between the vent cover and the cookplate" suggests combining the disclosures.

As explained by the Federal Circuit, "to establish obviousness based on a combination of the elements disclosed in the prior art, there must be some motivation, suggestion or teaching of the desirability of making the specific combination that was made by the Applicant." In re Kotzab, 54 U.S.P.Q.2d 1308, 1316 (Fed. Cir. 2000); M.P.E.P. 2143.01.

Further, as is well established, the mere fact that the prior art structure could be modified does not make such a modification obvious unless the prior art suggests the desirability of doing so. See In re Gordon, 221 U.S.P.Q.2d 1125 (Fed. Cir. 1984). The Federal Circuit has determined that:

[i]t is impermissible to use the claimed invention as an instruction manual or "template" to piece together the teachings of the prior art so that the claimed invention is rendered obvious. This court has previously stated that "[o]ne cannot use hindsight reconstruction to pick and choose among isolated disclosures in the prior art to deprecate the claimed invention."

In re Fritch, 23 U.S.P.Q.2d 1780, 1784 (Fed. Cir. 1992).

Further, under Section 103, “it is impermissible . . . to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of other parts necessary to the full appreciation of what such reference fairly suggests to one of ordinary skill in the art.” In re Wesslau, 147 U.S.P.Q. 391, 393 (CCPA 1965). Rather some suggestion to combine such references and a reasonable expectation of success must both be found in the prior art, and not based on Applicants’ disclosure. In re Vaeck, 20 U.S.P.Q.2d 1436 (Fed. Cir. 1991). In the present case, neither a suggestion nor motivation to combine the cited art, or any reasonable expectation of success has been shown.

Accordingly, since there is no teaching or suggestion in the cited art for the claimed combination, the Section 103 rejection appears to be based on hindsight reconstruction in which isolated disclosures have been picked and chosen in an attempt to deprecate the present invention. Of course, such a combination is impermissible, and for at least this reason, Applicants request that the Section 103 rejection be withdrawn.

If art “teaches away” from a claimed invention, such a teaching supports the nonobviousness of the invention. U.S. v. Adams, 148 USPQ 479 (1966); Gillette Co. v. S.C. Johnson & Son, Inc., 16 USPQ2d 1923, 1927 (Fed. Cir. 1990). In light of this standard, it is respectfully submitted that the cited art, as a whole, is not suggestive of the presently claimed invention. Moreover, Applicants respectfully submit Waite teaches away from a vent trim and/or a cover member that includes a surface with openings that is raised above a top surface and at least one vent cut of a cooktop to facilitate isolating the openings from spills on the cooktop, as set forth in Claims 1, 10, 16 and 25. Specifically, as discussed above, Waite is directed to a vent cover for an attic fan mounted above a ceiling to prevent air from leaking through the vent.

Accordingly, Applicants respectfully submit that the cited art as a whole teaches away from the assembly as recited in Claims 1, 10, 16 and 25.

Moreover, and to the extent understood, none of Levi, Waite and Taplan, considered alone or in combination, describes or suggests the claimed invention. Claim 1 recites an air

inlet system for a gas cooking apparatus comprising at least one gas burner and a burner box around the at least one gas burner, said air inlet system comprising “a cooktop configured to cover the burner box and having at least one peripheral vent cut configured to vent outside air into the burner box to provide air for the at least one gas burner, said at least one peripheral vent cut defining a recessed corner of said cooktop; and a vent trim attached to said cooktop and covering said at least one peripheral vent cut, said vent trim comprising a surface with openings raised above a top surface and said at least one peripheral vent cut of said cooktop, said vent trim facilitating isolating said openings from spills on said cooktop, an attachment portion overlapping said top surface of said cooktop, and at least one clip overlapping a bottom surface of said cooktop, said vent trim surface defining an underlying cavity, wherein said openings are configured to allow outside air to enter the burner box through said vent trim.”

None of Levi, Waite and Taplan, considered alone or in combination, describes or suggests an air inlet system for a gas cooking apparatus, as recited in Claim 1. More specifically, none of Levi, Waite and Taplan, considered alone or in combination, describes or suggests a vent trim that includes a surface with openings that is raised above a top surface and at least one vent cut of a cooktop to facilitate isolating the openings from spills on the cooktop, as required by Applicants’ claimed invention. Rather, in contrast to the present invention, Levi describes a cooktop including an integral peripheral portion defining a plurality of openings in the cooktop, Waite merely describes an attic vent cover including retaining clips for coupling portions of the cover to the attic vent, and Taplan merely describes an air-inlet device coupled to a bottom surface of a cook plate with adhesive.

Accordingly, for at least the reasons set forth above, Claim 1 is submitted to be patentable over Levi in view of Waite, and further in view of Taplan.

Claims 3 and 4 depend from independent Claim 1. When the recitations of Claims 3 and 4 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 3 and 4 likewise are patentable over Levi in view of Waite, and further in view of Taplan.

Claim 10 recites an air inlet system for a gas cooking apparatus having at least one gas burner and a burner box around the at least one gas burner, said air inlet system comprising “a cooktop configured to cover the burner box and having at least one peripheral vent cut configured to vent outside air into the burner box to provide air for the at least one gas burner; and an elongated cover member attached to a top face of said cooktop and covering said at least one peripheral vent cut, said cover member having a surface with openings configured to allow outside air to enter said at least one peripheral vent cut through said cover member, said cover member including a surface raised above said cooktop and said at least one peripheral vent cut, said cover member facilitating isolating said openings from spills on said cooktop, said surface defining an underlying cavity, said cover member comprising at least one tab extending within said cavity to mount said cover member on said top face, and said tab engaging a top surface of said top face.”

None of Levi, Waite and Taplan, considered alone or in combination, describes or suggests an air inlet system for a gas cooking apparatus, as recited in Claim 10. More specifically, none of Levi, Waite and Taplan, considered alone or in combination, describes or suggests a cover member that has a surface with openings, wherein the surface is raised above a cooktop and at least one peripheral vent cut to facilitate isolating the openings from spills on the cooktop, as required by Applicants’ claimed invention. Rather, in contrast to the present invention, Levi describes a cooktop including an integral peripheral portion defining a plurality of openings in the cooktop, Waite merely describes an attic vent cover including retaining clips for coupling portions of the cover to the attic vent, and Taplan merely describes an air-inlet device coupled to a bottom surface of a cook plate with adhesive.

Accordingly, for at least the reasons set forth above, Claim 10 is submitted to be patentable over Levi in view of Waite, and further in view of Taplan.

Claims 14 and 15 depend from independent Claim 10. When the recitations of Claims 14 and 15 are considered in combination with the recitations of Claim 10, Applicants submit that dependent Claims 14 and 15 likewise are patentable over Levi in view of Waite, and further in view of Taplan.

Claim 16 recites a gas cooking apparatus comprising “at least one gas burner; a burner box for said at least one gas burner; a cooktop configured to cover said burner box and having at least one peripheral vent cut configured to vent outside air into said burner box to provide air for said at least one gas burner, said at least one peripheral vent cut defining a recessed corner of said cooktop; and a vent trim attached to said cooktop and covering said at least one peripheral vent cut, said vent trim comprising a surface with openings raised above a top surface and said at least one peripheral vent cut of said cooktop, said vent trim facilitating isolating said openings from spills on said cooktop, an attachment portion overlapping said top surface of said cooktop, and at least one clip overlapping a bottom surface of said cooktop, said vent trim surface defining an underlying cavity, wherein said openings are configured to allow outside air to enter said burner box through said vent trim.”

None of Levi, Waite and Taplan, considered alone or in combination, describes or suggests a gas cooking apparatus, as recited in Claim 16. More specifically, none of Levi, Waite and Taplan, considered alone or in combination, describes or suggests a vent trim that includes a surface with openings that is raised above a top surface and at least one vent cut of a cooktop to facilitate isolating the openings from spills on the cooktop, as required by Applicants’ claimed invention. Rather, in contrast to the present invention, Levi describes a cooktop including an integral peripheral portion defining a plurality of openings in the cooktop, Waite merely describes an attic vent cover including retaining clips for coupling portions of the cover to the attic vent, and Taplan merely describes an air-inlet device coupled to a bottom surface of a cook plate with adhesive.

Accordingly, for at least the reasons set forth above, Claim 16 is submitted to be patentable over Levi in view of Waite, and further in view of Taplan.

Claims 18 and 19 depend from independent Claim 16. When the recitations of Claims 18 and 19 are considered in combination with the recitations of Claim 16, Applicants submit that dependent Claims 18 and 19 likewise are patentable over Levi in view of Waite, and further in view of Taplan.

Claim 25 recites a gas cooking apparatus comprising “at least one gas burner; a burner box for said at least one gas burner; a sealed cooktop configured to cover said burner box and having at least one peripheral vent cut configured to vent outside air into said burner box to provide air for said gas burner; and an elongated cover member attached to a top face of said cooktop and covering said at least one peripheral vent cut, said cover member having a surface with openings configured to allow outside air to enter said at least one peripheral vent cut through said cover member, said cover member including a surface raised above said cooktop and said at least one peripheral vent cut, said cover member facilitating isolating said openings from spills on said cooktop, said surface defining an underlying cavity, said cover member comprising at least one tab extending within said cavity to mount said cover member on said top face, and said tab engaging a top surface of said top face.”

None of Levi, Waite and Taplan, considered alone or in combination, describes or suggests a gas cooking apparatus, as recited in Claim 25. More specifically, none of Levi, Waite and Taplan, considered alone or in combination, describes or suggests a cover member that has a surface with openings, wherein the surface is raised above a cooktop and at least one peripheral vent cut to facilitate isolating the openings from spills on the cooktop, as required by Applicants’ claimed invention. Rather, in contrast to the present invention, Levi describes a cooktop including an integral peripheral portion defining a plurality of openings in the cooktop, Waite merely describes an attic vent cover including retaining clips for coupling portions of the cover to the attic vent, and Taplan merely describes an air-inlet device coupled to a bottom surface of a cook plate with adhesive.

Accordingly, for at least the reasons set forth above, Claim 25 is submitted to be patentable over Levi in view of Waite, and further in view of Taplan.

Claims 29 and 30 depend from independent Claim 25. When the recitations of Claims 29 and 30 are considered in combination with the recitations of Claim 25, Applicants submit that dependent Claims 29 and 30 likewise are patentable over Levi in view of Waite, and further in view of Taplan.

For at least the reasons set forth above, Applicants respectfully request that the Section 103 rejection of Claims 3, 4, 14, 15, 18, 19, 29 and 30 be withdrawn.

In view of the foregoing amendment and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully submitted,



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